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December 4, 2018

**VIA ECF**

Honorable Steven C. Mannion, U.S.M.J.  
United States District Court  
For the District of New Jersey  
M.L. King, Jr. Federal Bldg. & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *White, et al. v. Samsung Electronics America, Inc., et al.***  
**Civil Action No. 17-01775 (MCA) (SCM)**

Dear Judge Mannion:

We represent Defendant Samsung Electronics America, Inc. in the above-referenced matter. We submit for Your Honor's consideration the attached papers seeking the admission *pro hac vice* of Katharine Goodloe of the firm Covington & Burling LLP.

Plaintiffs' counsel has consented to this application. A Proposed Order and supporting declarations are enclosed. If the same meets with your approval, we respectfully request that Your Honor execute the enclosed Order and direct its entry.

We thank the Court for its assistance with this matter. If you have any questions or require further information, please do not hesitate to contact me.

Respectfully submitted,

s/ Michael R. McDonald  
Michael R. McDonald

Enclosures

cc: All counsel of record (*via* ECF)